

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

Plaintiff,

As representative of

THE COMMONWEALTH OF PUERTO
RICO

Debtor¹

CIVIL NO.: 17-BK-03283 (LTS)

PROMESA

TITLE III

RESPONSE AND RESERVATION OF RIGHTS IN OPPOSITION TO THE TWENTY-THIRD OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO TO EXACT DUPLICATE CLAIMS [ECF NO. 6272]

TO THE HONORABLE COURT:

COMES NOW creditor **Noelia Bravo Quiles**, through the undersigned counsel, and respectfully responds in opposition to the Twenty Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Exact Duplicate Claims [ECF No. 6272] “the Objection”, and states and prays as follows:

1. The Commonwealth of Puerto Rico (“Debtor”) has objected to some of creditor Noelia Bravo Quiles’ timely filed proofs of claim as duplicative.

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. Noelia Bravo Quiles has filed two proofs of claim pertaining to damages claimed on behalf of her two children in the pending State Court case *Rosa Lydia Vélez vs ELA*, KPE 1980-1738: Claim No. 50567 on behalf of minor D.T.B and Claim No. 38244 on behalf of minor C.J.T.B..

3. In Debtor's Objection No. 195, Prime Clerk Claim No. 50567, for \$150,000.00 is not duplicative. This claim is different and distinct from Claim No. 38244 as it pertains to two different children of Noelia Bravo Quiles.

4. In Debtor's Objection No. 195, Prime Clerk Claim No. 50567, Noelia Bravo Quiles moves the Court to deny Debtor's objection.

5. Noelia Bravo Quiles expressly reserves any rights in connection therewith and requests that, the non-substantive disallowance requested by Debtor should not prejudice Noelia Bravo Quiles's rights and claims, which were and are expressly reserved.

RESPECTFULLY SUBMITTED.

In Hormigueros, Puerto Rico, on this 27th day of May 2019.

I HEREBY CERTIFY that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to all counsel of record, and served a copy of the same via e-mail to Counsel for the Oversight Board and to the Creditors' Committee.

s/ María Herminia Cotto-Nieves
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